

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

DERIK DEANGELO, LUIS A.	:	
HERNANDEZ, CHAMBLIN GROUP	:	
REAL ESTATE VENTURES LLC AND	:	
REISPEC DEVELOPMENTS LLC,	:	Civil Action No.: 2:23-cv-22655
Plaintiffs,	:	
	:	
v.	:	
	:	
CESAR HUMBERTO PINA, et al.,	:	ANSWER TO PLAINTIFFS'
	:	FOURTH AMENDED COMPLAINT
Defendants .	:	
	:	

Defendant Raashaun Casey a/k/a DJ Envy, through his attorney(s) at The Marchese Law Firm, LLC, (Daniel G.P. Marchese, Esq.), by way of Answer to the Plaintiffs' Fourth Amended Complaint does say¹:

PARTIES, JURISDICTION AND BACKGROUND FACTS

1. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.
2. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.
3. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.
4. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

¹ Let it be noted and known that this Answering Defendant **vehemently** denies that he engaged in any conduct whatsoever to damage Plaintiffs and maintains that he had no involvement with any other named Defendant in enticing Plaintiffs to invest money with Defendant Cesar Pina, ultimately causing them damages as has been alleged in the Fourth Amended Complaint.

5. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

6. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

7. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

8. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

9. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

10. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

11. Defendant denies the allegations of this Paragraph.

12. Defendant admits the allegations of this Paragraph.

13. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

14. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

15. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

16. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

17. Defendant can neither admit nor deny the allegations of this Paragraph and

leaves the Plaintiffs to their proofs.

18. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

19. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

20. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

21. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

22. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

23. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

24. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

25. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

26. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

27. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

28. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

29. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

30. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

31. Defendant denies the allegations of this Paragraph.

32. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

33. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

34. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

35. Defendant denies the allegations of this Paragraph.

36. Defendant denies the allegations of this Paragraph.

37. Defendant denies the allegations of this Paragraph.

38. Defendant denies the allegations of this Paragraph.

39. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

40. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

FACTS COMMON TO ALL COUNTS

41. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

42. Defendant can neither admit nor deny the allegations of this Paragraph and

leaves the Plaintiffs to their proofs.

43. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

44. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

45. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

46. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

47. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

48. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

49. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

50. Defendant admits the allegations of this Paragraph.

51. Defendant admits the allegations of this Paragraph subject to the following caveat – upon information and belief, “The Breakfast Club” is broadcast East of the Mississippi.

52. Defendant denies the allegations of this Paragraph.

53. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

54. Defendant can neither admit nor deny the allegations of this Paragraph and

leaves the Plaintiffs to their proofs.

55. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

PARTIES

56. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

57. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

58. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

59. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

60. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

61. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

62. Defendant denies the allegations of this Paragraph.

63. Defendant denies the allegations of this Paragraph.

64. Defendant denies the allegations of this Paragraph.

65. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

66. Defendant denies the allegations of this Paragraph.

67. Defendant denies the allegations of this Paragraph.

68. Defendant denies the allegations of this Paragraph.

69. Defendant denies the allegations of this Paragraph.

70. Defendant denies the allegations of this Paragraph.

71. Defendant denies the allegations of this Paragraph.

72. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

73. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

PERSONAL MEETINGS AND “JOINT VENTURE” CONTRACTS

74. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

75. Defendant denies the allegations of this Paragraph.

76. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

77. Defendant denies the allegations of this Paragraph.

78. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

79. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

80. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

81. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

82. Defendant denies the allegations of this Paragraph.
83. Defendant denies the allegations of this Paragraph.
84. Defendant denies the allegations of this Paragraph.
85. Defendant denies the allegations of this Paragraph.
86. Defendant denies the allegations of this Paragraph.
87. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.
88. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.
89. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.
90. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.
91. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

DEFENDANTS' SOCIAL MEDIA MARKETING OPERATION

92. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.
93. Defendant denies the allegations of this Paragraph.
94. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.
95. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

96. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

97. Defendant admits the allegations of this Paragraph.

98. Defendant denies the allegations of this Paragraph.

99. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

100. Defendant denies the allegations of this Paragraph.

101. Defendant denies the allegations of this Paragraph.

102. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

103. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

104. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

105. Defendant denies the allegations of this Paragraph.

106. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

107. Defendant denies the allegations of this Paragraph.

108. Defendant denies the allegations of this Paragraph.

109. Defendant denies the allegations of this Paragraph.

110. Defendant denies the allegations of this Paragraph.

111. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

112. Defendant denies the allegations of this Paragraph.

113. Defendant denies the allegations of this Paragraph.

114. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

115. Defendant denies the allegations of this Paragraph.

116. Defendant denies the allegations of this Paragraph.

117. Defendant denies the allegations of this Paragraph.

118. Defendant denies the allegations of this Paragraph.

119. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

VICTIMS SPEAK OUT AND THE SCAM IS EXPOSED

120. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

121. Defendant denies the allegations of this Paragraph.

122. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

123. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

FACTS SPECIFIC TO PLAINTIFF DEANGELO

124. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

125. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

126. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

127. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

128. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

129. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

130. Defendant denies the allegations of this Paragraph.

131. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

132. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

133. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

134. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

135. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

136. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

137. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

138. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

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147. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

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leaves the Plaintiffs to their proofs.

150. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

151. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

152. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

FACTS SPECIFIC TO PLAINTIFF CHAMBLIN GROUP

153. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

154. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

155. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

156. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

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158. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

159. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

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leaves the Plaintiffs to their proofs.

161. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

162. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

163. Defendant denies the allegations of this Paragraph.

164. Defendant denies the allegations of this Paragraph.

165. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

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167. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

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169. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

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174. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

175. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

176. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

177. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

178. Defendant denies the allegations of this Paragraph.

179. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

180. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

181. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

182. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

183. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

FACTS SPECIFIC TO PLAINTIFF REISPEC DEVELOPMENTS, LLC

184. Defendant can neither admit nor deny the allegations of this Paragraph and

leaves the Plaintiffs to their proofs.

185. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

186. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

187. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

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189. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

190. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

191. Defendant denies the allegations of this Paragraph.

192. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

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206. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

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208. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

209. Defendant denies the allegations of this Paragraph.

210. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

211. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

212. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

213. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

FACTS SPECIFIC TO PLAINTIFF HERNANDEZ

214. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

215. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

216. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

217. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

218. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

219. Defendant can neither admit nor deny the allegations of this Paragraph and

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220. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

221. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

222. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

223. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

224. Defendant denies the allegations of this Paragraph.

225. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

226. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

227. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

228. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

229. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

230. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

231. Defendant can neither admit nor deny the allegations of this Paragraph and

leaves the Plaintiffs to their proofs.

232. Defendant denies the allegations of this Paragraph.

233. Defendant denies the allegations of this Paragraph.

234. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

235. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

236. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

237. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

238. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

239. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

FACTS SPECIFIC TO PLAINTIFF WE FAMILY

240. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

241. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

242. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

243. Defendant can neither admit nor deny the allegations of this Paragraph and

leaves the Plaintiffs to their proofs.

244. Defendant denies the allegations of this Paragraph.

245. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

246. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

247. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

248. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

249. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

250. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

251. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

252. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

SPECIFIC FACTUAL ALLEGATIONS AGAINST DEFENDANT JENNIFER PINA

253. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

254. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

255. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

256. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

257. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

258. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

259. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

260. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

261. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

262. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

263. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

264. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

265. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

SPECIFIC FACTUAL ALLEGATIONS AGAINST DEFENDANT LUIS “LUCIE” PINA

266. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

267. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

268. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

269. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

270. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

271. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

272. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

273. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

274. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

275. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

276. Defendant can neither admit nor deny the allegations of this Paragraph and leaves the Plaintiffs to their proofs.

SPECIFIC FACTUAL ALLEGATIONS AGAINST DEFENDANT RAASHAUN CASEY

- 277. Defendant denies the allegations of this Paragraph.
- 278. Defendant denies the allegations of this Paragraph.
- 279. Defendant denies the allegations of this Paragraph.
- 280. Defendant denies the allegations of this Paragraph.
- 281. Defendant denies the allegations of this Paragraph.
- 282. Defendant denies the allegations of this Paragraph.
- 283. Defendant denies the allegations of this Paragraph.
- 284. Defendant denies the allegations of this Paragraph.
- 285. Defendant denies the allegations of this Paragraph.
- 286. Defendant denies the allegations of this Paragraph.
- 287. Defendant denies the allegations of this Paragraph.
- 288. Defendant denies the allegations of this Paragraph.
- 289. Defendant denies the allegations of this Paragraph.
- 290. Defendant denies the allegations of this Paragraph.
- 291. Defendant denies the allegations of this Paragraph.
- 292. Defendant denies the allegations of this Paragraph.
- 293. Defendant denies the allegations of this Paragraph.

FIRST COUNT

294. Defendant hereby incorporates his responses to the allegations contained in Paragraphs 1 through 293 of the Fourth Amended Complaint, as if set forth fully herein.

- 295. Defendant denies the allegations of this Paragraph.

- 296. Defendant denies the allegations of this Paragraph.
- 297. Defendant denies the allegations of this Paragraph.
- 298. Defendant denies the allegations of this Paragraph.
- 299. Defendant denies the allegations of this Paragraph.
- 300. Defendant denies the allegations of this Paragraph.
- 301. Defendant denies the allegations of this Paragraph.
- 302. Defendant denies the allegations of this Paragraph.
- 303. Defendant denies the allegations of this Paragraph.
- 304. Defendant denies the allegations of this Paragraph.
- 305. Defendant denies the allegations of this Paragraph.
- 306. Defendant denies the allegations of this Paragraph.
- 307. Defendant denies the allegations of this Paragraph.
- 308. Defendant denies the allegations of this Paragraph.
- 309. Defendant denies the allegations of this Paragraph.
- 310. Defendant denies the allegations of this Paragraph.
- 311. Defendant denies the allegations of this Paragraph.
- 312. Defendant denies the allegations of this Paragraph.

WHEREFORE, Defendant demands judgment dismissing the First Count of Plaintiffs' Fourth Amended Complaint with prejudice, together with costs of suit and such other relief as the Court deems appropriate.

SECOND COUNT

313. Defendant hereby incorporates his responses to the allegations contained in Paragraphs 1 through 312 of the Fourth Amended Complaint, as if set forth fully

herein.

314. Defendant denies the allegations of this Paragraph.

315. Defendant denies the allegations of this Paragraph.

316. Defendant denies the allegations of this Paragraph.

317. Defendant denies the allegations of this Paragraph.

318. Defendant denies the allegations of this Paragraph.

319. Defendant denies the allegations of this Paragraph.

320. Defendant denies the allegations of this Paragraph.

321. Defenant denies the allegations of this Paragraph.

WHEREFORE, Defendant demands judgment dismissing the Second Count of Plaintiffs' Fourth Amended Complaint with prejudice, together with costs of suit and such other relief as the Court deems appropriate.

THIRD COUNT

322. Defendant hereby incorporates his responses to the allegations contained in Paragraphs 1 through 321 of the Fourth Amended Complaint, as if set forth fully herein.

323. Defendant denies the allegations of this Paragraph.

324. Defendant denies the allegations of this Paragraph.

325. Defendant denies the allegations of this Paragraph.

326. Defendant denies the allegations of this Paragraph.

327. Defendant denies the allegations of this Paragraph.

328. Defendant denies the allegations of this Paragraph.

329. Defendant denies the allegations of this Paragraph.

WHEREFORE, Defendant demands judgment dismissing the Third Count of Plaintiffs' Fourth Amended Complaint with prejudice, together with costs of suit and such other relief as the Court deems appropriate.

FOURTH COUNT

330. Defendant hereby incorporates his responses to the allegations contained in Paragraphs 1 through 329 of the Fourth Amended Complaint, as if set forth fully herein.

331. Defendant denies the allegations of this Paragraph.

332. Defendant denies the allegations of this Paragraph.

333. Defendant denies the allegations of this Paragraph.

334. Defendant denies the allegations of this Paragraph.

335. Defendant denies the allegations of this Paragraph.

336. Defendant denies the allegations of this Paragraph.

337. Defendant denies the allegations of this Paragraph.

WHEREFORE, Defendant demands judgment dismissing the Fourth Count of Plaintiffs' Fourth Amended Complaint with prejudice, together with costs of suit and such other relief as the Court deems appropriate.

FIFTH COUNT

338. Defendant hereby incorporates his responses to the allegations contained in Paragraphs 1 through 337 of the Fourth Amended Complaint, as if set forth fully herein.

339. Defendant denies the allegations of this Paragraph.

340. Defendant denies the allegations of this Paragraph.

- 341. Defendant denies the allegations of this Paragraph.
- 342. Defendant denies the allegations of this Paragraph.
- 343. Defendant denies the allegations of this Paragraph.
- 344. Defendant denies the allegations of this Paragraph.
- 345. Defendant denies the allegations of this Paragraph.
- 346. Defendant denies the allegations of this Paragraph.
- 347. Defendant denies the allegations of this Paragraph.
- 348. Defendant denies the allegations of this Paragraph.
- 349. Defendant denies the allegations of this Paragraph.
- 350. Defendant denies the allegations of this Paragraph.
- 351. Defendant denies the allegations of this Paragraph.
- 352. Defendant denies the allegations of this Paragraph.
- 353. Defendant denies the allegations of this Paragraph.
- 354. Defendant denies the allegations of this Paragraph.
- 355. Defendant denies the allegations of this Paragraph.
- 356. Defendant denies the allegations of this Paragraph.
- 357. Defendant denies the allegations of this Paragraph.
- 358. Defendant denies the allegations of this Paragraph.
- 359. Defendant denies the allegations of this Paragraph.
- 360. Defendant denies the allegations of this Paragraph.

WHEREFORE, Defendant demands judgment dismissing the Fifth Count of Plaintiffs' Fourth Amended Complaint with prejudice, together with costs of suit and such other relief as the Court deems appropriate.

SIXTH COUNT

361. Defendant hereby incorporates his responses to the allegations contained in Paragraphs 1 through 360 of the Fourth Amended Complaint, as if set forth fully herein.

362. Defendant denies the allegations of this Paragraph.

363. Defendant denies the allegations of this Paragraph.

364. Defendant denies the allegations of this Paragraph.

365. Defendant denies the allegations of this Paragraph.

366. Defendant denies the allegations of this Paragraph.

367. Defendant denies the allegations of this Paragraph.

368. Defendant denies the allegations of this Paragraph.

369. Defendant denies the allegations of this Paragraph.

370. Defendant denies the allegations of this Paragraph.

371. Defendant denies the allegations of this Paragraph.

372. Defendant denies the allegations of this Paragraph.

WHEREFORE, Defendant demands judgment dismissing the Sixth Count of Plaintiffs' Fourth Amended Complaint with prejudice, together with costs of suit and such other relief as the Court deems appropriate.

SEVENTH COUNT

373. Defendant hereby incorporates his responses to the allegations contained in Paragraphs 1 through 372 of the Fourth Amended Complaint, as if set forth fully herein.

374. Defendant denies the allegations of this Paragraph.

- 375. Defendant denies the allegations of this Paragraph.
- 376. Defendant denies the allegations of this Paragraph.
- 377. Defendant denies the allegations of this Paragraph.
- 378. Defendant denies the allegations of this Paragraph.
- 379. Defendant denies the allegations of this Paragraph.
- 380. Defendant denies the allegations of this Paragraph.
- 381. Defendant denies the allegations of this Paragraph.
- 382. Defendant denies the allegations of this Paragraph.

WHEREFORE, Defendant demands judgment dismissing the Seventh Count of Plaintiffs' Fourth Amended Complaint with prejudice, together with costs of suit and such other relief as the Court deems appropriate

EIGHTH COUNT

383. Defendant hereby incorporates his responses to the allegations contained in Paragraphs 1 through 382 of the Fourth Amended Complaint, as if set forth fully herein.

- 384. Defendant denies the allegations of this Paragraph.
- 385. Defendant denies the allegations of this Paragraph.
- 386. Defendant denies the allegations of this Paragraph.
- 387. Defendant denies the allegations of this Paragraph.
- 388. Defendant denies the allegations of this Paragraph.
- 389. Defendant denies the allegations of this Paragraph.
- 390. Defendant denies the allegations of this Paragraph.
- 391. Defendant denies the allegations of this Paragraph.

392. Defendant denies the allegations of this Paragraph.

393. Defendant denies the allegations of this Paragraph.

WHEREFORE, Defendant demands judgment dismissing the Eighth Count of Plaintiffs' Fourth Amended Complaint with prejudice, together with costs of suit and such other relief as the Court deems appropriate

NINTH COUNT

394. Defendant hereby incorporates his responses to the allegations contained in Paragraphs 1 through 393 of the Fourth Amended Complaint, as if set forth fully herein.

395. Defendant denies the allegations of this Paragraph.

396. Defendant denies the allegations of this Paragraph.

397. Defendant denies the allegations of this Paragraph.

398. Defendant denies the allegations of this Paragraph.

399. Defendant denies the allegations of this Paragraph.

400. Defendant denies the allegations of this Paragraph.

401. Defendant denies the allegations of this Paragraph.

402. Defendant denies the allegations of this Paragraph.

403. Defendant denies the allegations of this Paragraph.

404. Defendant denies the allegations of this Paragraph.

405. Defendant denies the allegations of this Paragraph.

406. Defendant denies the allegations of this Paragraph.

407. Defendant denies the allegations of this Paragraph.

408. Defendant denies the allegations of this Paragraph.

409. Defendant denies the allegations of this Paragraph.

410. Defendant denies the allegations of this Paragraph.

411. Defendant denies the allegations of this Paragraph.

WHEREFORE, Defendant demands judgment dismissing the Ninth Count of Plaintiffs' Fourth Amended Complaint with prejudice, together with costs of suit and such other relief as the Court deems appropriate.

TENTH COUNT

412. Defendant hereby incorporates his responses to the allegations contained in Paragraphs 1 through 411 of the Fourth Amended Complaint, as if set forth fully herein.

413. Defendant denies the allegations of this Paragraph.

414. Defendant denies the allegations of this Paragraph.

415. Defendant denies the allegations of this Paragraph.

416. Defendant denies the allegations of this Paragraph.

417. Defendant denies the allegations of this Paragraph.

418. Defendant denies the allegations of this Paragraph.

419. Defendant denies the allegations of this Paragraph.

420. Defendant denies the allegations of this Paragraph.

421. Defendant denies the allegations of this Paragraph.

422. Defendant denies the allegations of this Paragraph.

423. Defendant denies the allegations of this Paragraph.

424. Defendant denies the allegations of this Paragraph.

425. Defendant denies the allegations of this Paragraph.

426. Defendant denies the allegations of this Paragraph.

WHEREFORE, Defendant demands judgment dismissing the Ninth Count of Plaintiffs' Fourth Amended Complaint with prejudice, together with costs of suit and such other relief as the Court deems appropriate

AFFIRMATIVE DEFENSES

1. Plaintiffs' claims are barred for the failure to state a cause of action upon which relief may be granted.

2. Plaintiffs' claims are barred by the doctrines of waiver, estoppel and laches.

3. Plaintiffs' claims are barred by the doctrines of res judicata, collateral estoppel and the entire controversy doctrine.

4. Plaintiffs' claims are barred by the applicable statute of limitations.

5. Plaintiffs' claims are barred by the doctrine of release.

6. Plaintiffs' claims are barred by the doctrine of accord and satisfaction.

7. The amount claimed by Plaintiffs to be due and owing is grossly overstated.

8. Plaintiffs' have not sustained an ascertainable loss of money or property.

9. Defendant did not violate any duty it may have owed to Plaintiffs, whether arising under common law, statute, contract or otherwise.

10. Defendant acted in good faith in all dealings with Plaintiffs.

11. Plaintiff has suffered no legally compensable damages.

12. Plaintiffs have failed to mitigate their damages.

13. Defendant is under no contractual, statutory or common law duty or

obligation to pay Plaintiffs the sums allegedly due and owing.

14. Any and all damages allegedly sustained were the result of unforeseeable intervening acts of a third party over which Defendant had no control.

15. Plaintiffs' claims are barred by the doctrine of avoidable consequences.

16. Plaintiffs were solely responsible for the damages allegedly sustained as a result of the incident(s) described within the Complaint.

17. Defendant reserves the right to amend this Answer to assert additional separate affirmative defenses upon the completion of an investigation now being conducted.

DEMAND FOR TRIAL BY JURY

The Defendant hereby demands a trial by jury of the within cause of action.

THE MARCHESE LAW FIRM, LLC

Attorneys for Defendant Raashaun Casey a/k/a DJ Envy



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